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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

NOTICE OF PARCEL SHIPPERS ASSOCIATION (PSA) OF DESIGNATION OF WRITTEN CROSS-EXAMINATION OF UNITED PARCEL SERVICE WITNESS LUCIANI (UPS-T-5); AND REQUEST TO CONDUCT ORAL CROSS-EXAMINATION OF UPS WITNESS LUCIANI

Pursuant to Rule 4(a) of the Special Rules of Practice in this proceeding, Parcel Shippers Association (PSA) hereby designates witness Luciani's responses to the interrogatories listed below as its written cross-examination of this witness:

PSA/UPS-T5-1-2. USPS/UPS-T5-3, 5-6, 8, 10-12, 17-18, 20-23, 29-31, 33-34. AMAZ/UPS-T5-1-2, 4-10.

In accordance with the Special Rules, two copies of the interrogatories designated above are being submitted to the Commission.

PSA will conduct oral cross-examination of witness Luciani with respect to followup questions to his answers to written cross-examination; and more specifically with respect to his testimony concerning implicit cost coverages related to the passthrough method; the "upper bound" passthrough of DDU cost avoidance; and DBMC cost avoidance.

Respectfully submitted,

Timothy J. May Esquire

Patton Boggs LLP 2550 M Street, NW

Washington, DC 20037-1350

Tel. 202/457-6050

Fax: 202/457-6315

Counsel for Parcel Shippers Association

Dated: July 6, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.

Timothy J. May

Dated: July 6, 2000